



## Filing Receipt

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**PROJECT NO. 52373**

**REVIEW OF WHOLESALE ELECTRIC  
MARKET DESIGN**

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**PUBLIC UTILITY COMMISSION  
  
OF TEXAS**

**ENEL OVERVIEW**

Enel North America (Enel) appreciates the opportunity to provide feedback. Enel is a multinational power company and a leading integrated player in the global power, gas and renewables markets. It is the largest European utility by market capitalization and ordinary EBITDA, and is present in over 30 countries worldwide, producing energy with over 88 GW of managed capacity. Enel distributes electricity through a network of over 1.3 million miles, and with over 73 million business and household end users globally, the Group has the largest customer base among its European peers.

Enel's renewables arm, Enel Green Power, is the world's largest renewable private player, managing around 46 GW of wind, solar, geothermal and hydropower plants in Europe, the Americas, Africa, Asia and Oceania. Enel operates in the US and Canada through two companies: Enel Green Power North America and Enel X North America. Enel Green Power North America is a leading owner and operator of renewable energy plants with a presence in 18 US states and one Canadian province. The company operates around 70 plants with a managed capacity of over 6 GW powered by wind, hydropower, geothermal and solar energy.

Enel X in North America has around 4,500 business customers, spanning more than 35,000 sites, representing approximately \$10.5B in energy spend under management, approximately 4.7 GW of demand response capacity and over 70 battery storage projects that are operational and under contract. Enel X is revolutionizing the EV charging market with its smart charging solutions deploying around 60,000 charging stations in the US.

## **COMMENTS FROM ENEL NORTH AMERICA, INC.**

In response to Commission Questions 1, 3 and 5-16, Enel will not provide separate responses, but supports comments filed by Advanced Power Alliance (APA), the Advanced Energy Management Association (AEMA) and the Texas Advanced Energy Business Alliance (TAEBA).

### **2. What modifications could be made to existing ancillary services to better reflect seasonal variability?**

The Commission and ERCOT should consider expanding ancillary service procurements. Specifically, the Commission should study expanding Fast Responding Regulation Service. Currently, ERCOT only procures 65MW in the Up direction, and 35MW in the Down direction of this valuable resource.

### **5. Are there alternatives to an LSE Obligation that could address the concerns raised about the stakeholder proposals submitted to the Commission?**

In comments submitted on August 16<sup>th</sup> 2021, Enel recommended that the Commission study long-term reliability products that are in place in PJM, ISO New England, and New York ISO. These products support long-term system reliability, offer flexibility in terms of procurement periods, and put the performance responsibility on generators. The Commission should study this approach, and study a 4-hour duration requirement, since the Commission has indicated in work sessions and memos that they are interested in expanding 4-hour resources in ERCOT. This approach, if done correctly, draws on the foundations of ERCOT's market: competition, open markets, and technology neutrality.

Implementing such a reliability product is a longer-term change, which would take months of stakeholder discussion in addition to an implementation period. Additionally, any new market products would need to be designed so as not to detract value from existing market products, which compensate

resources for the significant value they add. A problem statement and clearly defined objectives would be necessary before proceeding with a change of this magnitude.

## **CONCLUSION**

Enel appreciates this opportunity to provide comments and looks forward to working with the Commission and other interested parties.

Respectfully submitted,

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## **EXECUTIVE SUMMARY OF ENEL NORTH AMERICA, INC. COMMENTS**

- The Commission should study increasing procurement of certain ancillary services to support reliability across seasons.
- The Commission should study reliability products in place at PJM, ISO New England, and New York ISO when considering long-term reliability.
- Any new additional reliability products should be given appropriate time for study, comment, and development before being put in place.

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